Southern California Gas Company

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May 2, 2013

Mr. Michael Robertson, P.E.
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
320 W. Fourth Street, Suite 500
Los Angeles, CA 90013

Dear Mr. Robertson:

The staff of the Safety and Enforcement Division (SED) conducted a General Order (GO) 112-E compliance inspection of Southern California Gas Company's (SoCalGas) West Area Transmission facilities on August 21-24, and August 27-31, 2012. The audit included a review of records for Brea, Goleta, Olympic/Pico, Saticoy, Ventura/Oxnard, Taft and Valencia districts for the period of May 2011 through August 2012 and field inspections of various gas transmission pipeline facilities.

SED staff did not find any probable violations in the audit. However, SED staff observed some potential issues and made some recommendations. Attached is our written response and proposed corrective actions.

Please feel free to contact me at (213) 305-8660, if you have any questions or need additional information.

Sincerely,

Jeff Koskie

W. Jeff Koskie
Pipeline Safety and Compliance Manager

Attachments

Cc: Joel Tran, CPUC-Los Angeles

Attachment 1
Response to Audit Observations

Recommendation #1

On August 27, 2012, SED staff conducted a field inspection of SoCalGas' facilities at Vintage La Habra Producer site (#5450). During the inspection, SED staff observed that the producer's gas delivery flow panel indicator had a 110 degrees Fahrenheit readout. SoCalGas Gas Standard 188.0001, Standard Specifications for Natural and Substitute Fuel Gases (GAS QUALITY SPECIFICATION), paragraph 4.12 "Delivery Temperature" states:
"4.12.1 The gas delivery temperature is not to be below 50°F or above 105°F".
SoCalGas explained that it has an alarm monitoring device that will shut in the producer if the alarm senses out of tolerance parameters (e.g. elevated temperature), but the high temperature alarm did not activate in this case. It was not clear if the temperature measuring device was out of tolerance, defective or in good working condition. SED staff recommended that SoCal Gas inspect the monitoring instruments, calibrate and verify that it is functioning as appropriate.

Response

Upon further investigation by the District that same day, it was determined that the high temperature alarm shut in was not configured in the SCADAPack when it was initially installed. Although the gas temperature exceeded 105°F, there was no indication that the condition compromised the safety of the pipeline system. The downstream pipeline was installed in 2005 with the Entec yellow extruded PE coating that is rated at 140 °F. At no time was the integrity of the pipe or coating compromised in any way.

Actions Taken

The District immediately worked with the producer to lower the inlet gas temperature. The temperature was reduced below 105 °F by 4:00 pm that same day. The next morning, the SCADA programmer from the Engineering Measurement, Regulation and Control group configured the alarm in the SCADAPack so it would automatically shut in at 105°F.

Corrective action was taken to properly configure the high temperature shut in to avoid recurrence. We verified that all of our other districts that have producers with the SCADAPack are configured to shut in at a high temperature of 105 °F. There are also three producer sites that do not have a SCADAPack, and monthly temperature checks have not found any facilities to be operating outside of maximum allowable temperatures.

Recommendation #2

SED staff observed some locations with missing pipeline markers. Please restore the missing pipeline markers and ensure that pipeline markers are placed appropriately wherever necessary to identify the locations of gas pipelines.

Response

The location described in the Oxnard District is in an agricultural field. Upon further investigation, appropriate line markers are located in the field, but were obstructed by telephone poles and a working mulch pile from the auditor's vantage point that day. The District places the markers adjacent to the poles in some locations to help ensure they do not get plowed under. Also the dirt road through the field, where the auditors were looking for a line marker, changes with the crop being farmed every 3 – 6 months. The District makes every effort to see that this field is adequately marked from one year to the next.

Local management in the Taft District remembers the location(s) the SED staff refers to as located along Line 7000 in a rural area. There were road crossings where some line markers were missing due to vehicular damage in those areas. Many times markers placed at road crossings get run over by large trucks making wide turns. Whenever these are observed, the markers are replaced. Line markers are checked during regular patrols, during leak surveys, whenever the District employees are out on the ROW and also whenever they are working in the field.

Actions Taken

Gas Standard 223.0075, addressing pipeline marker placement has been reviewed by all employees performing patrolling tasks on the pipeline. Supplemental pipeline markers will be installed in locations where they may currently be partially blocked by telephone poles or any other obstructions.